

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

JIMMIE LEWIS

V

CAN. 04-1350 (GMS)

DR. SYLVIA FOSTER, ETAL

MOTION FOR 20 DEPOSITION ANSWERS
1D FOR DEFENDANT BRIAN JOHNSON
PURSUANT TO FED R. CIV P # 30(A)(2)
IN ACCORDANCE TO THE HONORABLE JUDGE
GREGORY M. SLEETS FEB 21, 07 ~~MEMORANDUM~~
MEMORANDUM P. 8

DATE: 3/12/07



Jimmie Lewis
SBI # 506622
DEL. CORR. CENTER
1181 PADDOCK RD
SMYRNA, DEL 19977

- 1.) BRIAN JOHNSON WHAT IS YOUR SPECIFIC ACCOUNT OF WHAT OCCURRED AT THE D.P.C MITCHELL BUILDINGS DINNING HALL ON 6/14/04 AT OR ABOUT 11:00 PM , REGARDING THE PLAINTIFF JIMMIE LEWIS
- 2.) BRIAN JOHNSON WHO CALLED YOU TO COME TO THE MITCHELL BUILDING FOR ASSISTANCE ON 6/14/04 AT OR ABOUT 11:00 PM , REGARDING THE PLAINTIFF JIMMIE LEWIS
- 3.) BRIAN JOHNSON WHO ARRIVED AT THE D.P.C MITCHELL BUILDING ON 6/14/04 AT OR ABOUT 11:00 PM TO ASSIST YOU . WITH ESCORTING THE PLAINTIFF JIMMIE LEWIS TO THE SECLUSION ROOM.
- 4.) BRIAN JOHNSON WHAT IS THE DISCRIPTION OF YOUR JOB DUTIES .

- 5.) BRIAN JOHNSON HAVE YOU EVER HAD TO UTILIZE FORCE ON A PATIENT AT THE D.P.C
- 6.) BRIAN JOHNSON ARE YOU REQUIRED TO FILE AN INDIVIDUAL ACCOUNT OF WHAT OCCURED WHEN EVER YOU WERE INVOLVED WITH PLACING A ~~ANA~~ PATIENT IN (4) POINT RESTRAINTS
- 7.) BRIAN JOHNSON HAVE YOU EVER FILED GRIEVANCE(S) REGARDING ~~YOUR~~ ~~JOB DUTIES~~ THE DISCRPTION OF YOUR JOB DUTIES AT THE D.P.C .

CERTIFICATE OF SERVICE

I, THE UNDERSIGNED PLAINTIFF JIMMIE LEWIS
DOE HEREBY CERTIFY ON THIS 12TH, DAY OF MARCH,
2007; THAT I DID MAIL ONE TRUE AND CORRECT
COPY OF THE MOTION FOR 20 DEPOSITION ANSWERS
1 D FOR DEFENDANT BRIAN JOHNSON PURSUANT
TO FED R. CIV P# 30 (A)(2) IN ACCORDANCE TO
THE HONORABLE JUDGE GREGORY M. SLEET'S FEB 21, 07
ORDER, BY U.S. POSTAL TO THE FOLLOWING:

CLERK OF THE COURT (GMS)
UNITED STATES DISTRICT COURT
844 N. KING ST, LOCKBOX 18
WILMINGTON, DELAWARE 19801

GREGORY E. SMITH
DEPUTY ATTORNEY GENERAL
820 N. FRENCH ST, 7TH FL
WILMINGTON, DELAWARE 19801

DATE: 3/12/07

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TM: Jimmie Lewis
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CLERK OF THE COURT (GMS)
UNITED STATES DISTRICT COURT
844 N. KING ST, LOCK BOX 18
WILMINGTON, DELAWARE
19801

